

OCT 27 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Policies and Rules Implementing)	CC Docket No. 93-22
the Telephone Disclosure and)	RM-7990
Dispute Resolution Act)	

COMMENTS OF QUINTREX DATA SYSTEMS, CORP.
IN SUPPORT OF AT&T'S PETITION FOR LIMITED WAIVER

Quintrex Data Systems, Corp. ("QDS"), for itself and the client local telephone companies for which QDS provides billing software services, submits these comments in support of AT&T's Petition for Limited Waiver on an Expedited Basis filed with the Commission on October 20, 1993 ("AT&T Petition"). AT&T is requesting an eight month delay in meeting certain requirements imposed by Sections 64.1509(b)(2), 65.1510(a)(2)(i), (ii), and 64.1510(b) of the Commission's Rules. QDS is a software development company which provides billing software to over 50 small telephone companies in 19 states.

QDS supports AT&T's request. As explained in the AT&T Petition, QDS agrees that AT&T is dependent on QDS, its client telcos, and others as billing agents to fulfill AT&T's compliance with the rules. QDS and its client telcos will find it extremely difficult, if not impossible, to fulfill certain 900 service billing requirements. Specifically, requirements to display and print 900 pay-per-call messages on separate statements and the corresponding printing of billing rights on those statements will require extensive changes beyond those achievable by November 1.

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While neither QDS nor its clients are directly responsible for compliance with the Commission's 900 pay-per-call rules, AT&T contracts with our clients to perform billing and collection functions for long distance calls including 900 pay-per-calls. Compliance with the Commission's rules requires the teamwork and integration of several systems and parties. QDS is working in an expeditious manner to perform the extensive programming changes required to ensure that 900 pay-per-call messages are recorded correctly on subscribers' bills.

QDS provides billing software on two different IBM computer systems with two different sets of software. About half of our client telcos use each system. The specific software systems that must be altered involve complex programming pertaining to message processing, editing and sorting of calls with individual subscribers bills, and formatting and printing of individual messages at various locations throughout each subscriber's bill.

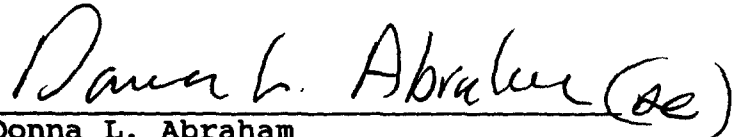
QDS is in the process of testing the software changes for one of our systems and will need additional time to complete this effort and release the changes for our clients' use. For the second system, QDS is in the process of completing all of the software changes and will also need additional time. The time frames we anticipate for completion of the work on both systems should put our completion well ahead of AT&T's requested extension. Our client telcos will be able to disseminate the annual disclosure statement provision of the 900 pay-per-call

rules.¹ QDS estimates full completion of AT&T's billing changes by January 1, 1994.

For all of the above reasons and those stated in the AT&T Petition, QDS urges the Commission to grant the extension request of AT&T consistent with the comments contained herein. This will allow QDS the necessary time to finish proper coding and testing of software before final release to our client telcos.

Respectfully submitted,

QUINTREX DATA SYSTEMS, CORP.

Handwritten signature of Donna L. Abraham in cursive script, followed by the initials "(se)" in parentheses.

Donna L. Abraham
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October 27, 1993

¹ 47 C.F.R. § 64.1509(b)(2).

CERTIFICATE OF SERVICE

I, Rita H. Bolden, certify that a copy of the foregoing Comments of Quintrex Data Systems, Corp., In Support of AT&T's Petition for Limited Waiver in CC Docket No. 93-22/RM-7990 was served on this 27th day of October 1993, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached list:

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